REMARKS/ARGUMENTS

The Examiner is thanked for the performance of a thorough search. By this amendment, Claims 1, 18, and 23 have been amended. No claims have been added or canceled. Hence, Claims 1, 3–18, 20–23, and 25–42 are pending in this application.

The amendments to the claims do not add any new matter to this application and are supported by the Specification. The amendments to the claims were made to improve the readability and clarity of the claims and not necessarily for any reason related to patentability.

All issues raised in the Office Action are addressed hereinafter.

I. INTERVIEW SUMMARY

Applicants thank the Examiner for the telephone interview conducted on October 2, 2008. Examiner Tran represented the USPTO. Applicants were represented by Karl T. Rees and Marcel Bingham. The parties discussed Claim 1 and the references *Davis* and *Davis '608*. In particular, Applicants provided the Examiner with examples and explanations of the claimed method. In response, Examiner suggested that further amendments were necessary to clarify the method. No agreement on the allowability of Claim 1 was reached.

II. CLAIM REJECTIONS BASED ON 35 U.S.C. § 101

Claims 18, 20–23, 25–39, and 41–42 were rejected under 35 U.S.C. § 101 as allegedly directed to non-statutory subject matter. Specifically, the Office Action alleged that the Claims are directed towards "software per se." The rejection is respectfully traversed.

Claims 18 and 23 are presently amended to recite that the apparatus includes "one or more processors coupled to a memory." Thus, Claims 18 and 23, along with their dependent claims 20–22, 25–39, and 41–42, are not directed towards software. Rather, Claims 18, 20–23, 25–39, and 41–42 are directed towards hardware comprising means and/or components for performing various functions. *See MPEP 2106.01(I)* ("When a computer program is recited in conjunction with a physical structure, such as a computer memory, USPTO personnel should treat the claim as a product claim.").

For at least the reasons explained above, Claims 18, 20–23, 25–39, and 41–42 presently recite statutory subject matter under 35 U.S.C. § 101. Reconsideration of the rejection is requested.

III. CLAIM REJECTIONS BASED ON 35 U.S.C. § 103

Claims 1, 3–18, 20–23, and 25–42 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over U.S. Pub. No. 2003/0041077 by Davis et al. (hereinafter "*Davis*") in view of U.S. Patent No. 6,920,608 to Davis et al. (hereinafter "*Davis '608*"). Applicants traverse the rejection. Reconsideration is respectfully requested.

CLAIM 1

Claim 1 presently recites, among other elements:

> reading, from the database, said internal metadata;
> **wherein said internal metadata is metadata that describes data, stored in the database;**
> . . .
> presenting to the user one or more user interface controls for receiving, from said user, a definition of external metadata in said report;
> **wherein the external metadata is metadata that describes report data for said report;**
> . . .
> **wherein the definition of external metadata specifies particular external metadata in said report to associate with said subset of internal metadata;**
> . . .
> receiving, via the one or more user interface controls, said definition of external metadata from said user;
> based on the definition of external metadata, creating a mapping between said selected internal metadata and the particular external metadata specified by the definition of external metadata; and
> based at least on the mapping, generating a report definition for said report, wherein said report definition describes how the report data described by the external metadata in said report is to be produced from the data stored in the database and described by said internal metadata.

Amended Claim 1 therefore clarifies the context in which its method for establishing a mapping between internal metadata and external metadata may be implemented. Specifically, the method of amended Claim 1 creates a mapping between "metadata that describes data, stored in the database" and "metadata that describes report data for said report." Moreover, amended Claim 1 clarifies that the "definition of external metadata" received from a user is used to create "creating a mapping between . . . selected internal metadata and . . . particular external metadata." This mapping is then used to generate a report definition.

The cited references fail to teach or suggest the method of Claim 1 for at least the reasons discussed below.

(1) The references fail to teach generating a report definition based on a mapping

Claim 1 recites "based at least on [a] mapping, generating a report definition for [a] report." More specifically, Claim 1 recites that the "report definition describes **how . . . report data described by . . . external metadata in [a] report is to be produced from . . . data stored in [a] database** and described by . . . internal metadata."

Neither reference teaches, nor is alleged to teach, generating a report definition within the meaning of Claim 1. The references further fail to teach that a report definition is generated **based on a mapping** between metadata for a database and metadata for a report.

(2) The references fail to teach that a mapping is created based on a definition of external metadata

Claim 1 also recites "based on [a] definition of external metadata, **creating a mapping** between . . . internal metadata [selected in a grid] and . . . particular external metadata specified by the definition of external metadata." Neither reference teaches such a step.

The Office Action alleges that a similar step is taught in *Davis* at ¶¶ [0087]–[0090]. However, *Davis* teaches only that (a) a XBRL document may be validated for syntax and semantics according to a DTD and (b) once the XBRL document is validated, it may be translated into a NDOM object.

As one skilled in the art would understand, a translated object is not a mapping. Moreover, even though the translation process implies the existence of a mapping between XBRL and NDOM, *Davis* does not teach an actual step of "creating a mapping," as recited in

Claim 1. Rather, *Davis* assumes that a mapping already exists between XBRL and NDOM. By contrast, the method of Claim 1 allows one to easily create new mappings.

Even if *Davis* were to teach how to create a mapping, *Davis*' mapping would not teach the mapping created in Claim 1. Whereas *Davis*' mapping would simply be a hard-coded translation of XBRL to NDOM, Claim 1 recites the creation of a very specific type of mapping—a mapping "**between a subset of internal metadata** and . . . **particular external metadata**." *Davis* does not teach or suggest a mapping of a user-selected subset of internal metadata to particular external metadata. For example, *Davis* does not show that internal metadata may be selected by a user on a grid and then mapped to specific external metadata for a report.

Finally, the references do not teach or suggest creating a mapping based on "a definition of external metadata." Applicants note that *Davis* at ¶¶ [0087]–[0090] mentions a DTD and that the Office Action alleges that a DTD is a "definition of external metadata" within the meaning of Claim 1. As discussed below, a DTD is not a "definition of external metadata" within the meaning of Claim 1. However, even if a DTD were a "definition of external metadata" within the meaning of Claim 1, it is quite clear that the translation process discussed in *Davis* at ¶¶ [0087]–[0090] does not involve the DTD. **While the DTD is used to validate the XBRL prior to translation, the DTD is not used in building the NDOM**. Thus, the DTD plays absolutely no role in any mapping-related process.

(3) A DTD is not a "definition of external metadata" within the meaning of Claim 1

Claim 1 recites steps that involve a "definition of external metadata." Claim 1 defines a "definition of external metadata" as "**specify[ing] particular external metadata** in said report **to associate with** . . . **internal metadata** [selected by a user in a grid]." The cited references fail to teach or suggest a "definition of external metadata" within this meaning.

The Office Action alleges that the XMRL DTD discussed in *Davis* at ¶¶ [0087]–[0090] is a definition of external metadata within the meaning of Claim 1. The Office Action is mistaken. A DTD for a data format defines how data in that format is structured. One may "validate" data according to a DTD, so as to make sure that the data conforms to the structure expected for that format. A DTD may also be used to identify the context of certain data (for example, should the number 20081002 be interpreted as a number or a date).

While the XBRL DTD may therefore be considered a "definition" for the XBRL format, the XBRL DTD is not "a definition of external metadata" within the meaning of Claim 1. The "definition of external metadata" of Claim 1 "specifies particular external metadata in [a] report to associate with [a] subset of internal metadata." Thus, the definition of external metadata recited in Claim 1 indicates how a certain subset of internal metadata should be mapped to a certain portion of external metadata. The **XBRL DTD, by contrast, is only used to validate XBRL**. The XBRL DTD is **silent about any other type of metadata**. Thus, the XBRL DTD does not "specif[y] particular external metadata in [a] report to associate with [a] subset of internal metadata [selected by a user]."

Furthermore, the XBRL DTD is not "a definition of external metadata" because it is never "receive[ed], via . . . one or more user interface controls," as recited in Claim 1. While the Office Action shows that a DTD may indeed be "received," **none of the mechanisms by which the Office Action shows a DTD may be received bear any similarity to the grid-based user interface** by which Claim 1 recites that "a definition of external metadata" may be received.

The Office Action also alleges that the RDML DTD discussed in *Davis '608* is also a "definition of external metadata." However, for all practical purposes, the RDML DTD is functionally equivalent to the XBRL DTD, and therefore not a "definition of external metadata" within the meaning of Claim 1.

For at least the foregoing reason, the combination of *Davis* and *Davis '068* fails to teach or suggest at least one feature of independent Claim 1. Therefore, the combination of *Davis* and *Davis '068* does not render Claim 1 obvious under 35 U.S.C. § 103. Reconsideration is respectfully requested.

INDEPENDENT CLAIMS 18 AND 23

Independent Claims 18 and 23 also recite features argued above with relation to Claim 1, although Claims 18 and 23 are expressed in another format. Because Claims 18 and 23 have at least one of the features described above for Claim 1, Claims 18 and 23 are therefore allowable over the combination of *Davis* and *Davis '068* for at least one of the same reasons as given above for Claim 1. Reconsideration is respectfully requested.

DEPENDENT CLAIMS 1, 3–17, 20–22, AND 25–42

Each of Claims 1, 3–17, 20–22, and 25–42 depend from Claims 1, 18, or 23, and includes the above-quoted features of its parent claim by dependency. Thus, the combination of *Davis* and *Davis '068* also fails to teach or suggest at least one feature found in Claims 1, 3–17, 20–22, and 25–42. Therefore, the combination of *Davis* and *Davis '068* does not render obvious 1, 3–17, 20–22, and 25–42. Reconsideration of the rejection is respectfully requested.

In addition, each of Claims 1, 3–17, 20–22, and 25–42 recite at least one feature that independently renders it patentable. However, to expedite prosecution in light of the fundamental differences already identified, further arguments for each independently patentable feature of Claims 1, 3–17, 20–22, and 25–42 are not provided at this time. Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

IV. CONCLUSION

For the reasons set forth above, all of the pending claims are now in condition for allowance. The Examiner is respectfully requested to contact the undersigned by telephone relating to any issue that would advance examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,
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